

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

_____)	
United State of America)	
)	
v.)	Cr. No. 23-CR-12-1-PB
)	
Rhonda Simpson,)	
Defendant.)	
_____)	

DEFENDANT’S ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARING

NOW COMES Defendant, Rhonda Simpson, by and through counsel, Shaheen & Gordon, P.A., respectfully moving to continue her Sentencing Hearing and, in support thereof, states as follows:

1. The Sentencing Hearing is presently scheduled in this matter for September 11, 2024 at 10:00 a.m., the day after the New Hampshire State Primary Election.
2. Undersigned counsel is legal counsel for the New Hampshire Democratic Party. Undersigned counsel will be required to be available in the event legal action is necessary during the primary election and the days that follow. Additionally, undersigned counsel is the chairperson of a gubernational campaign participating in the September 10, 2024 primary. Counsel’s commitment to these election matters makes him unavailable for Defendant’s Sentencing Hearing on September 11, 2024.
3. Accordingly, Defendant respectfully moves to continue her Sentencing Hearing presently scheduled for September 11, 2024 at 10:00 a.m.

4. If the Court's calendar permits, the parties are available for the Sentencing Hearing in this matter on: September 16th, September 17th, the afternoon of September 18th or on September 23rd.

5. Pursuant to LR 7.1(c), undersigned has conferred with AUSA Charles Rombeau, who advised he assents to this request to continue the Sentencing Hearing and is also available for hearing on the dates provided in paragraph 4.

6. Due to the nature of the relief sought herein, no memorandum of law is necessary.

WHEREFORE, Defendant respectfully requests that this Honorable Court:

- a. Grant the within Motion;
- b. Continue Defendant's Sentencing Hearing scheduled for September 11, 2024;
- c. If the Court's calendar permits, reschedule Defendant's Sentencing Hearing to either September 16th, September 17th, the afternoon of September 18th or on September 23rd;
- d. Grant such further relief as this Court deems necessary and just.

Respectfully submitted,

Rhonda Simpson
By Her Attorneys:
SHAHEEN & GORDON, P.A.

Dated: July 19, 2024

/s/ William E. Christie
William E. Christie
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has this day been filed with the Court using the Court's filing system and served on all counsel of record.

/s/ William E. Christie

William E. Christie

NH Bar #11255